

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MICHIGAN

JEWEL UPSHAW, Individually and as the  
Personal Representative for the Estate of  
ZENA RAY UPSHAW a/k/a ZENA R.  
UPSHAW, ZENA UPSHAW and ZENA  
“ZEKE” UPSHAW, Deceased,

Plaintiff,

v.

SSJ GROUP, LLC,  
THE DELTAPLEX ARENA,  
UNIVERSITY OF MICHIGAN HEALTH  
SYSTEM, UNIVERSITY OF MICHIGAN  
BOARD OF REGENTS; LIFE EMS, INC.  
d/b/a LIFE EMS AMBULANCE; and  
EDWIN T. KORNOELJE, D.O.,

Defendants.

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**DEFENDANT LIFE EMS, INC.’S RESPONSE TO PLAINTIFF’S MOTION TO  
APPROVE SETTLEMENT & AMENDED MOTION TO FILE UNDER SEAL  
EXHIBITS A, B, AND C TO PLAINTIFF’S MOTION FOR LEAVE TO SETTLE  
WRONGFUL DEATH CLAIM AND DISTRIBUTE PROCEEDS**

NOW COMES Defendant, LIFE EMS, INC. d/b/a LIFE EMS AMBULANCE, by and through its attorneys, BLANCO WILCZYNSKI, PLLC, and in response to Plaintiff’s Motion to Approve Settlement and Amended Motion to File Under Seal Exhibits A, B, and C to Plaintiff’s Motion for Leave to Settle Wrongful Death Claim and Distribute Proceeds, states that it has reviewed Plaintiff’s amended motion and confidential Exhibits A, B, and C, including the bill of costs required by the Court’s Order of 8/16/22, along with

Plaintiff's Motion for Leave to Settle Wrongful Death Claim and Distribute Proceeds, and Defendant Life EMS, Inc. has no objections to the relief being sought by Plaintiff therein.

Respectfully submitted,

**BLANCO WILCZYNISKI, P.L.L.C.**

By: /s/ Orlando L. Blanco

**ORLANDO L. BLANCO [P-34480]  
DEREK S. WILCZYNISKI [P-57079]**  
Attorneys for Defendant Life EMS  
2095 East Big Beaver Road, Suite 400  
Troy, MI 48083  
(248) 519-9000

Dated: October 3, 2022

**CERTIFICATE OF SERVICE**

I hereby certify that on October 3, 2022, I electronically filed the foregoing document with the Clerk of the Court using the ECF system, which will send notification of such filing to all counsel of record in this matter.

By: /s/ Orlando L. Blanco

**ORLANDO L. BLANCO [P-34480]  
DEREK S. WILCZYNISKI [P-57079]  
BLANCO WILCZYNISKI, P.L.L.C.**  
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